



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

17 March 2023

Jason Walsh
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Mr. Damon Smith
Office of General Counsel
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

Dear Mr. Smith:

On behalf of the BlueGreen Alliance (BGA), a coalition of the nation's largest labor unions and environmental organizations, collectively representing millions of members and supporters, we urge HUD to incorporate the latest applicable consensus-based codes that include hazard-resistance criteria as a requirement for Community Development Block Grants Disaster Recovery (CDBG-DR) and in alignment with FEMA requirements. This will support climate mitigation efforts so that buildings are climate resilient and will streamline block grant implementation by a qualified workforce.

To improve the Nation's level of climate resilience and support workforce readiness, HUD should not limit compliance to products of just one organization (International Code Council (ICC)). The resiliency of America's buildings relies on a robust ecosystem of codes and standards developed by standards developing organizations. Today's buildings are more resilient because of this ecosystem, and the increased involvement of stakeholders interested in improving efficiency and resiliency. There are a handful of consensus-based plumbing and mechanical codes that are incorporated by states into their construction requirements. We support requiring federal policies for construction and repairs to include all the latest major construction codes and standards that are voluntary consensus standards, including those approved by the American National Standards Institute (ANSI) as American National Standards.

Requiring the latest applicable voluntary consensus-based codes that include hazard resistance criteria will achieve three things:

1. Align with FEMA's Building Codes Strategy to utilize the latest hazard-resistant building codes
2. Ensure workforce readiness and quality of work by avoiding re-training costs for plumbing and mechanical apprenticeships based on existing standards that may be more stringent than the ICC standards
3. Ensure a market-based approach for federal funding by utilizing relevant codes and standards approved as American National Standards and international codes

Thank you for your consideration on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Walsh', with a stylized, cursive script.

Jason Walsh
Executive Director
BlueGreen Alliance